REMARKS

Applicants reply to the Office Action mailed on April 7, 2006, within the shortened statutory three month period for reply. Claims 1-9 were pending in the application and the Examiner rejects claims 1-9. Support for the amendments may be found in the originally-filed specification, claims, and figures. For example, the amendments to claim 1 are found at, for example, page 16, lines 23-27. No new matter has been introduced by these amendments. Reconsideration of this application is respectfully requested.

Claims 1-5 and 7 are rejected under 35 U.S.C. 112 as being unclear. Applicants respectfully traverse these rejections. However, to expedite prosecution of this application, Applicants amend claims 1-5 and 7 to further clarify these claims.

Claims 1-9 are rejected as being obvious over Angelo, et al., US Patent No. 5,923,754 ("Angelo") in view of Venkatesan, et al., US Patent No. 6,801,999 ("Ven") and further in view of Sims, US Publication No. 2002/0016919 ("Sims"). Applicants respectfully traverse these rejections.

In Applicants' previous Reply dated January 6, 2006 to the previous Office Action, Applicants argued that neither Angelo or Ven disclose the feature of determining that a value of the content key storage section in its initial state and the current value of the content key storage section are different. The Examiner now cites Sims, and asserts that because this reference teaches the concept of checking whether a key is revoked - revoked being interpreted as an "initial state" different than a "current state" (valid key).

Applicants respectfully assert that the Examiner is misinterpreting the meaning of "an initial state". Referring to page 2, first paragraph of the Office Action, the Examiner alleges that the term is not defined in the specification, and therefore, he has interpreted its meaning as any state previous to a "current state". Therefore, the Examiner's conclusion is that a revoked key of Ven can meet the claimed limitation "initial state".

Contrary to the Examiner's assertion, several descriptions of the term "initial state" in the present specification exist, and these clearly define it as a state after power on or reset. This distinguishes the present invention over Ven, whose alleged "initial state" is merely an expired key, which is not a memory state immediately after a power up of a decryption device.

However, in the interests of expediting prosecution, Applicants further define claims 1 and 6 over the cited references by incorporating this explanation into the claim language.

Moreover, the Examiner asserts that because Ven discloses the use of keys which expire after a given time, and because Sims discloses checking whether keys have been revoked or expired, it would therefore be obvious to combine these references to arrive at the abovementioned limitation. Applicants respectfully disagree and assert that, even if the abovementioned references are combined, they have not been shown to teach determining a value of the content-key storage section in its "initial state", in the context of what is meant by "initial state" with regard to the present invention.

On page 2, first paragraph of the Office Action, the Examiner asserts that the term "initial state" is not described in the specification. Applicants respectfully disagree and assert that at several points throughout the specification a clear description is given of what is meant by this terminology, see for example page 4, lines 6-9 or page 16, lines 23-27. For the purposes of expediting prosecution and further distinguishing over the cited references, claims 1, 2, 6 and 7 have been amended to explicitly recite that an initial state refers to a state "immediately after at least one of a power-on of the decryption device and the decryption device is reset".

Ven discloses that a watermark key, K, can be associated with issue T_i and expiration T_e, times. The triple (K, T_i, T_e) can be stored in a secure key manager. If this watermark key is compromised, then a new key (K', T_i', T_e') will be issued and distributed to all client PCs using the compromised key, so that each of these PCs will have two key triples for K and K'.

As such, it appears that the Examiner is asserting that K is equivalent to the "initial state" and K' is equivalent to the "current state" of the claimed invention. However, the Examiner has not shown anywhere within Ven that K would be a state of a "content key memory" immediately after a power on or reset operation. On the contrary, when using the keys K or K' of Ven, the same problem of the prior art described on pages 3-5 of the present specification might occur within Ven. There is no indication that Ven addresses this problem, i.e. how to prevent a value of memory which occurs immediately after a power on or reset operation, from being used to fraudulently decrypt content.

Further, Applicants assert that since Ven does not discuss the problems of the claimed invention (e.g., how to prevent a value within a content key section from being used fraudulently in decrypting content), and Ven is not concerned with the solution to this problem.

Similarly, Sims has not been shown to teach or suggest the feature of determining whether a value of the content-key storage section in its initial state and a current value of the content-key

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storage section are different. In the portions of Sims cited by the Examiner, it is merely disclosed that when a particular private key has been compromised, update information received from a clearing house may indicate one of the public keys may no longer be used, thus a check is performed against a "revoked list" to determine whether use of a particular private key should be disallowed.

Furthermore, as the Examiner has admitted in the Office Action, Angelo clearly does not teach the above-discussed feature, or discuss the problems which it is intended to solve. Accordingly, neither Angelo, Ven, Sims, nor any combination thereof, disclose or suggest at least "whether a value of the content-key storage section in an initial state and a current value of the content-key storage section are different," as similarly recited in independent claims 1, 2, 6 and 7.

Dependent claims 3-5 and 8-9 variously depend from independent claims 1 and 6, so Applicants assert that dependent claims 3-5 and 8-9 are differentiated from the cited references for at least the reasons set forth above, in addition to their own respective features.

In view of the above remarks and amendments, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject Application. Applicants authorize and respectfully request that any fees due be charged to Deposit Account No. 19-2814.

Respectfully submitted,

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